

OGLOZA FORTNEY LLP
Darius Ogloza (SBN 176983)
dogloza@oglozafortney.com
David Fortney (SBN 226767)
dfortney@oglozafortney.com
535 Pacific Avenue, Suite 201
San Francisco, California 94133
Telephone: (415) 912-1850
Facsimile: (415) 887-5349

Attorneys for Plaintiff
VERSION2 TECHNOLOGY, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

VERSION2 TECHNOLOGY, INC., a
Delaware Company,

Plaintiff,

v.

NEILMED PHARMACEUTICALS, INC., a
California corporation,

Defendant.

CASE NO. 3:16-CV-04720-LB

**STIPULATION OF DISMISSAL AND
~~PROPOSED~~ ORDER**

1 Plaintiff Version2 Technology, Inc. (“Version2”) and Defendant NeilMed
2 Pharmaceuticals, Inc. (“NeilMed”) stipulate as follows:

3 WHEREAS, on August 17, 2016, Version2 filed its complaint for (1) attempted
4 monopolization in violation of Section 2 of the Sherman Act, (2) declaratory relief, and (3)
5 violation of California Business and Professions Code § 17200, *et seq.*; and

6 WHEREAS, the parties have engaged in settlement discussions, and have reached an
7 agreement as to a settlement.

8 NOW, THEREFORE, the parties, through their respective counsel of record, hereby
9 respectfully request that this Court dismiss this action with prejudice against Defendant NeilMed
10 pursuant to FRCP 41(a)(1)(A).

11 SO STIPULATED.

12
13 Dated: February 2, 2017

FREEDMAN + TAITELMAN LLP

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15 By: /s/ Steven Stiglitz

Michael Taitelman

Steven Stiglitz

Attorneys for Defendant

NeilMed Pharmaceuticals, Inc.

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19 Dated: February 2, 2017

OGLOZA FORTNEY LLP

20 By: /s/ Darius Ogloza

Darius Ogloza

Attorneys for Plaintiff

Version2 Technology, Inc.

[~~PROPOSED~~] ORDER

Having considered the stipulated request of the parties to dismiss the August 17, 2016 complaint, and finding GOOD CAUSE therefor, the Court hereby issues the following Order:

The action is dismissed with prejudice as against Defendant NeilMed pursuant to FRCP 41(a)(1)(A).

IT IS SO ORDERED.

DATED: 3/31/2017, 2016



The Honorable Laurel Beeler

Judge of the Northern District of California